UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

United States of America

v.

**Addendum Protective Order** 

20 Cr. 575

Fred Mastroianni

Defendant.

Upon the application of the United States of America, with the consent of the undersigned counsel, and a suppression hearing under Fed. R. Crim. P. 12 having been scheduled, the Court hereby finds and orders as follows:

- 1. The Government will make disclosure to the defendant of documents, objects, and information, including electronically stored information ("ESI"), pursuant to Federal Rule of Criminal Procedure 26.2 ("Rule 26.2 Material").
- 2. Facilitation of Discovery. The entry of this addendum protective order will permit the Government to produce expeditiously the Rule 26.2 Material without further litigation. It will also afford the defense prompt access to those materials, which will facilitate the preparation of the defense.
- 3. Good Cause. There is good cause for entry of the protective order set forth herein.

  NOW, THEREFORE, FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED:
- 4. Each and every provision of the Protective Order previously entered in this matter on November 20, 2020 (ECF No. 24) applies with equal force to Rule 26.2 Material.
- 5. The provisions of this order shall not terminate at the conclusion of this criminal prosecution and the Court will retain jurisdiction to enforce this Order following termination of the case.

## AGREED AND CONSENTED TO:

DAMIAN WILLIAMS United States Attorney

Ryan W. Allison

by:

Assistant United States Attorney

Stephen Lewis

Counsel for Fred Mastroianni

Date: September 28, 2022

Date: Syptule 29, 2022

SO ORDERED:

Dated: White Plains, New York

September <u>39</u>, 2022 September 30, 2022

THE HONORABLE PHILIP M. HALPERN UNITED STATES DISTRICT JUDGE